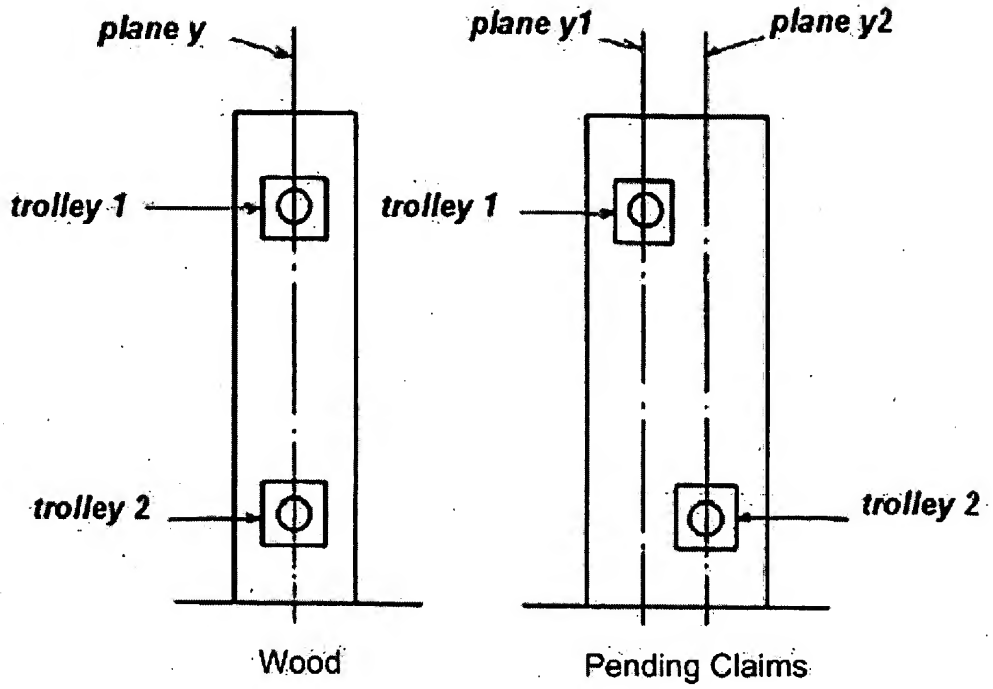
REMARKS

Claims 1 – 8 have been examined. It appears from comments in the Office Action that the claims as originally filed were examined, rather than the claims as amended by the Preliminary Amendment filed concurrently with the application on July 24, 2003. It is believed that the objections to the claims are moot in light of that Preliminary Amendment.

Claims 1 and 2 stand rejected under 35 U.S.C. §102(b) as anticipated by U.S. Pat. No. 2,086,144 ("Wood") and as anticipated by U.S. Pat. No. 5,697,575 ("Moore"); Claim 6 stands rejected under 35 U.S.C. §103(a) as unpatentable over Wood or Moore in view of U.S. Pat. No. 4,378,095 ("Reynolds"); and Claim 8 stands rejected under 35 U.S.C. §103(a) as unpatentable over Wood in view of U.S. Pat. No. 4,278,489 ("Horsley"). Claim 7 has been identified as allowable except for its dependence from a rejected base claim.

The rejections are respectfully traversed. It is noted as an initial matter that the claims are directed to an winding system for handling reels of *tissue*. This is reflected not only in the preambles to the claims, but also in the body of at least independent Claim 1, which recites a pair of reels "for each ply of laminar tissue to be applied.". Neither Wood nor Reynolds discloses reels with plies of laminal *tissue* as the claims require. Instead, both Wood and Reynolds are concerned with unwinders for standard paper. Tissue paper is a type of paper with specific characteristics, with very low grammage (weight) and which is handled through the use of much larger reels than is the case with standard paper (*see, e.g.*, Application, p. 1, ll. 4 – 8 describing tissue paper generally and p. 1, ll. 12 – 27 describing certain issues related to tissue paper). Since neither of the cited references discloses the claim limitations related to unwinding of *tissue* paper, the claims are not anticipated by either Wood or Moore.

In addition, it is noted that Wood employs an arrangement of two reels, denoted R and R', that are placed on their respective vertical displacement trolleys (trolley 1 and trolley 2 in the following diagram), which are mounted on the same vertical plane (y):



In the arrangement of Wood, the loading of new reels (R^2) to replace the upper reel (R') requires a ramp fixture (24) that is attached to the installation. This is in contrast to the pending claims, which require a pair of reels that are placed on respective vertical displacement trolleys (trolley 1 and trolley 2) in the diagram, which are mounted on different vertical planes (y_1 and y_2 respectively). This requirement is embodied in the claim limitation of Claim 1 that "one reel [is] located on an upper part and the other on a lower part *at a distance between them* that enables the reel in stand-by to be prepared whilst the other reel is in an operating mode" (emphasis added). This arrangement advantageously means that the position of the reels can be changed over at both the upper and the lower levels alike and that the new reels can be loaded either above or below to replace either of said reels.

Moore only allows for the loading of new reels on the lower part, as illustrated by Fig. 1 of Moore, an annotated version of which is reproduced below:

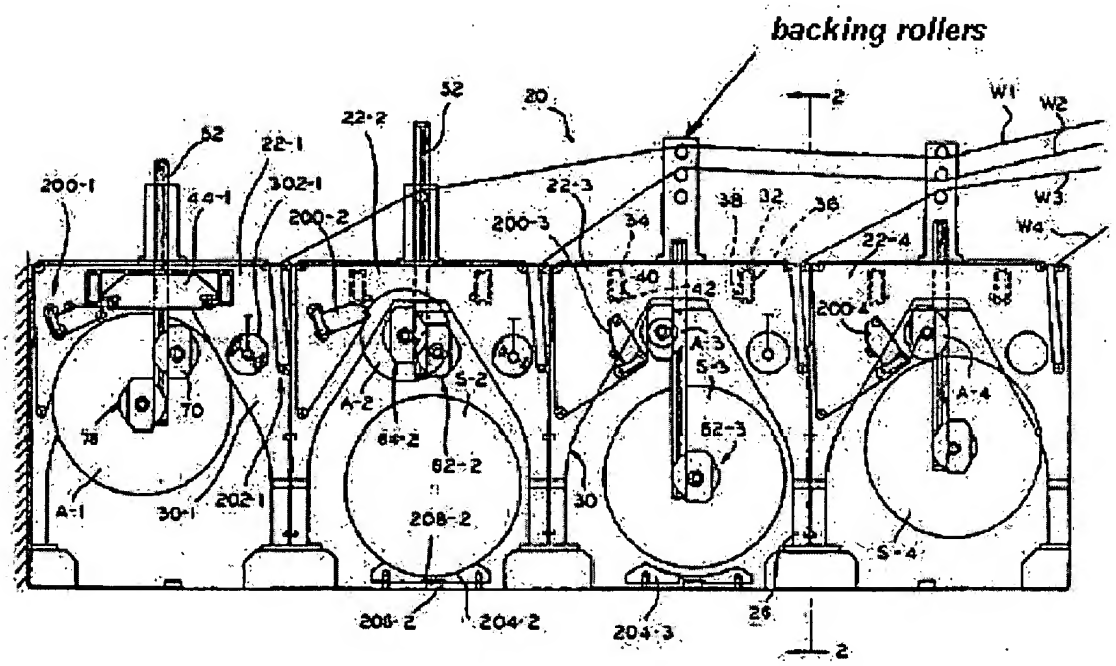


FIG. 1

Loading of new reels on the upper part is hindered by (1) backing rollers for the paper webs; (2) the paper webs themselves (w_1, w_2, w_3, and w_4); (3) support crossbars (44); and (4) splicing units (200) located on the upper part. Moore thus fails to disclose the limitation of Claim 1 of "a reel carrier from which one of the reels is removed is displaced vertically until it occupies the upper part, whilst a reel-carrier that holds a fresh reel that is coming into operation drops to a lower position, freeing the upper part for incorporation of a new reel in the reel-carrier that has become unoccupied." One consequence of the required configuration is that new reels can be loaded from below, from the front, or from above by use of a separate hoisting device, as illustrated in Figs. 6 and 7 of the application. The claimed arrangement thus provides significantly greater versatility.

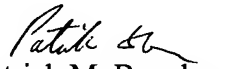
This may be contrasted with Moore, in which the splicer (200) for the reels is on the upper part. The splicing thus always has to be performed from the lower reel (S-2, S-3, S-4) to the upper reel (A-2, A-3, A-4), with unwinding always taking place from above. With the claimed structure, unwinding may proceed either from above or from below, and splicing may be performed from either the upper reel to the lower reel or the other way around. The claimed structure thus allows for loading maximum diameter reels at the same time, as well as for splicing maximum diameter reels.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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